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October 19, 2020

*Via ECF*

Honorable Joseph A. Dickson, U.S.M.J.  
United States District Court, District of New Jersey  
Martin Luther King Building & U.S. Courthouse  
50 Walnut Street  
Newark, New Jersey 07102

**Re: *Kimberlee Williams, et al. v. BASF Catalysts LLC, et al.***  
**Civil Action No. 2:11-cv-01754 (JLL) (JAD)**

Dear Judge Dickson:

Pursuant to the schedule set forth in the Order Preliminarily Approving the Settlement, Plaintiffs' Petition for Approval of Counsel Fees, Reimbursement of Expenses, and Awards for the Class Representatives is due today. Out of a courtesy to opposing counsel, we shared our motion with Defense Counsel on Thursday last week for comment. I learned this morning that our email was lost to follow up by BASF's Counsel. I am advised that we will not receive comments we might incorporate for filing today. For that reason, with BASF's counsel's consent and agreement, I write to ask for a one-day extension for the filing of Plaintiffs' motion.

I've spoken with counsel for Cahill who consents to this request as well. We anticipate filing the Petition on October 20, 2020.

Respectfully,

/s/ *HARRY M. ROTH*

CHRISTOPHER M. PLACITELLA  
HARRY M. ROTH  
Counsel for Plaintiffs

**So Ordered**

/s/ Joseph A. Dickson  
Hon. Joseph A. Dickson, U.S.M.J.

Dated: October 20, 2020